

Anthony Campbell v. Isolations Technologies
and Larry D'amato, Operations Manager.
MCAD DOCKET NO: 02SEM02493
Answers to Respondent's Production Request.

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AUGUST 22, 2003

PRODUCTION REQUEST

1. I was discriminated against by Isolations Technologies and Larry D'amato in violation of M.G.L. c.151B §4(1) and Title VII of the Civil Rights Act. (a) On March 29, 2002, Larry D'amato approached me while working and asked if it was true that I was interested in working full-time and/or being hired directly through Isolations Technologies. I replied definitely interested. Mr. D'amato responded, "That will not happen. A black person will never work full-time for Isolations Technologies. You were brought here just as a cover but will never be hired by Isolations Technologies. Stay with Excel".

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4. On or around June 21, 2002, July 19, 2002 and August 23, 2002, Certified Letters were sent to Paul Fattercofeit, Excel Staffing, 22 Water Street, Westborough, MA 01581, requesting my personnel file but are not limited to start pay rate, performance reviewed, end pay rate, position and hours worked. Also, reason(s) given for termination by Isolations Technologies (IT) but refused request. The letters of June 21, 2002 and July 19, 2002 were signed for but the letter of August 23, 2002 was returned, refused or Name unknown --- Mr. Paul Fattercofeit.

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10. This was reported to the Commonwealth of Massachusetts Commission Against Discrimination, Office of the Attorney General Of the Commonwealth Of Massachusetts, the Commonwealth of Massachusetts Labor Inspector Department.

Kind regards!

Sincerely yours,


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COMPLAINANT

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INTERROGATORIES

1. (a) My job performance was excellent at Isolations Technologies.
- (b) This was reported to the Commonwealth Of Massachusetts Commission Against Discrimination, the Office of the Attorney General Of the Commonwealth Of Massachusetts, the Commonwealth of Massachusetts Labor Inspector Department.
- (c) Once the Operations Manager, Mr. Larry D'amato made it known that Isolations Technologies was not going to hire a black person work full-time in the past, present, or future.
- (d) I was discriminated against by Isolations Technologies and Larry D'amato in violation of M.G.L. c.151B §4(1) and Title VII of the Civil Rights Act. (a) On March 29, 2002, Larry D'amato approached me while working and asked if it was true that I was interested in working full-time and/or being hired directly through Isolations Technologies. I replied definitely interested. Mr. D'amato responded, "That will not happen. A black person will never work full-time for Isolations Technologies. You were brought here just as a cover but will never be hired by Isolations Technologies. Stay with Excel".

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2. Operations Manager, Larry D'amato

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4. This was reported to the Commonwealth Of Massachusetts Commission Against Discrimination, the Office of the Attorney General Of the Commonwealth Of Massachusetts, the Commonwealth of Massachusetts Labor Inspector Department.

5. JOB SEARCHING

6. Corning NetOptix
2 Mercer Road
Natick, MA 01760
POSITION: PT---QUALITY CONTROL SUPERVISOR
JOB DUTIES: MANAGEMENT, TRAINING & DEVELOPMENT, PERSONNEL
SCHEDULING AND ANALYTICAL/PROBLEM SOLVING.
DOH: December 19, 2000 ---- May 15, 2001
SUPERVISOR: SUE BATES
REASON FOR LEAVING: NATICK DIVISION CLOSED DOWN

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RHODE ISLAND TOOL COMPANY
148 West River Street
Providence, RI 02908
POSITION: MACHINIST
JOB DUTIES: SET-UP, EDITING AND TROUBLESHOOTING
DOH: January 10, 2000 --- March 16, 2001
SUPERVISOR: BUTCH
HOURLYRATE: \$16.09
REASON FOR LEAVING: LAYOFF NO WORK.

SWISSTURN-U.S.A
1 Main Street
Whittinsville, MA
POSITION: MACHINIST (TEMPORARY)
DOH: May 2002 -- August 23, 2002
JOB DUTIES: SET-UP, EDITING AND TROUBLESHOOTING
HOURLY RATE: \$16.00
REASON FOR LEAVING: TEMPORARY NO WORK

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ADMISSION

1. In or around September, 2001, I was hired as Programmer/Machinist by Excel Staffing for assignment at Isolations Technologies as Machinist/Programmer.
2. Yes, I was interviewed.
3. Hired by Excel Staffing as Programmer/Machinist to work at Isolations Technologies as Machinist/Programmer.
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5. NO.
6. I did not speak nor discuss with Peter Zekos on anything because the employment offer was never made nor hired.
7. I was discriminated against by Isolations Technologies and Larry D'amato in

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9. I did report this to the Commonwealth of Massachusetts Commission Against Discrimination, the Office Of the Attorney General Of the Commonwealth of Massachusetts, the Commonwealth of Massachusetts Labor Inspector Department.

10. I was discriminated against by Isolations Technologies and Larry D'amato in violation of M.G.L. c.151B §4(1) and Title VII of the Civil Rights Act. (a) On March 29, 2002, Larry D'amato approached me while working and asked if it was true that I was interested in working full-time and/or being hired directly through Isolations Technologies. I replied definitely interested. Mr. D'amato responded, "That will not happen. A black person will never work full-time for Isolations Technologies. You were brought here just as a cover but will never be hired by Isolations Technologies. Stay with Excel".

Isolations Technologies & Larry D'amato discriminated against me by failing to consider to hire me based on race/color (Black), in violation of M.G.L. c. 151B §4(1) and Title VII of the 1964 Civil Rights Act. (b) A few moment later, Mr. D'amato approached me again and said, "I am the power who hires and fires, there will be no blacks ever to be hired by Isolations Technologies in the past, present, or future". I asked him if that's why there was not a single black employee at

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Isolations, and he said yes. I asked him if the owner, Micheal Rigolli, supported his view. Mr. D'amato stated that Micheal didn't have the power to hire and fire. He then stated that because he (Mr. D'amato) was Italian, he was the one with the power. After our conversation, I spoke with Steve (LNU) in the Quality Control. Steve informed me that Micheal Rigolli will be out of the office the next three days.

Isolations Technologies & Larry D'amato discriminated against me by failing to consider to hire me based on race/color (Black), in violation of M.G.L. c.151B §4(1) and Title VII of the 1964 Civil Rights Act." On April 2, 2002, I received a call from Paul, an employee at Excel Staffing, who informed me that I was no longer needed at Isolations Technologies according to Larry D'amato. While I had been working at Isolations, I saw many white individuals with little or no experience get hired. I believe I was more qualified for many positions into which white individuals were hired.

11. I did report this to the Commonwealth of Massachusetts Commission Against Discrimination, the Office Of the Attorney General Of the Commonwealth of Massachusetts, the Commonwealth of Massachusetts Labor Inspector Department.

12. I did report this to the Commonwealth of Massachusetts Commission Against Discrimination, the Office Of the Attorney General Of the Commonwealth of Massachusetts, the Commonwealth of Massachusetts Labor Inspector Department.

13. I did report this to the Commonwealth of Massachusetts Commission Against Discrimination, the Office Of the Attorney General Of the Commonwealth of Massachusetts, the Commonwealth of Massachusetts Labor Inspector Department.

Kind regards!

Sincerely yours,



Anthony Campbell
COMPLAINANT

COMMONWEALTH OF MASSACHUSETTS
COMMISSION AGAINST DISCRIMINATION

POST-DETERMINATION DISCOVERY ORDER

IN THE MATTER OF Campbell v. Isolations Technologies
DOCKET NUMBER: 022302493

The Investigating Commissioner has issued a Probable Cause determination in this matter. Pursuant to this Order, the parties may engage in discovery pursuant to 804 C.M.R. 1.19.

Requests for discovery including, but not limited to interrogatories, requests for documents and admissions, and depositions shall be completed and filed with the Commission within 3 months of the date of issuance of this Order.

Counsel for the parties are hereby authorized to issue subpoenas pursuant to 804 C.M.R. 1.14.

All original copies of discovery requests and responses, including transcripts of depositions, shall be filed as follows:

<input type="checkbox"/> Boston BEM, BCR, BED, BPH, BPR, BPA Enforcement Clerk Commission Against Discrimination One Ashburton Place, Room 601 Boston, MA 02108	<input checked="" type="checkbox"/> Springfield SEM, SCR, SED, SPH, SPR, SPA Enforcement Clerk Commission Against Discrimination 436 Dwight St., Suite 220 Springfield, MA 01103
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Upon the conclusion of the discovery period, the parties shall attend a Certification Conference pursuant to 804 CMR 1.20. Please see the reverse side of this Order for information concerning scheduling the Certification Conference.

This Order shall operate prospectively.

Dorca I. Gomez, Chairwoman

Cynthia A. Tucker, Commissioner

ISSUED

Date: 4/23/03

by:

Cynthia A. Tucker
Investigating Commissioner (or designee)